

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANSSEN BIOTECH, INC. and)	
NEW YORK UNIVERSITY)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:15-cv-10698
)	
CELLTRION HEALTHCARE CO., LTD.,)	
CELLTRION, INC., and)	
HOSPIRA, INC.)	
Defendants.)	
)	

PLAINTIFFS' MOTION TO STAY

Plaintiffs Janssen Biotech, Inc. and New York University (collectively "Plaintiffs" or "Janssen") hereby move this Court to stay proceedings with respect to U.S. Patent No. 6,284,471 (the "471 Patent") in their case against Celltrion Healthcare Co. Ltd., Celltrion, Inc., and Hospira, Inc. As set forth more fully in Janssen's memorandum of law and the Declaration of Alison Casey in Support of Plaintiffs' Motion to Stay, both of which are filed herewith, litigation over the 471 Patent at this time would be a waste of both the parties' and the Court's resources. The United States Patent & Trademark Office is considering validity of the 471 Patent in a co-pending reexamination proceeding. The 471 Patent's claims are currently rejected in that proceeding and the patent's specification has been amended. If the 471 Patent survives the reexamination, it will emerge in a different form.

Accordingly, the Court should stay proceedings relating to the 471 Patent.

REQUEST FOR ORAL ARGUMENT

Plaintiffs believe that oral argument may assist the court and hereby request oral argument on this motion.

Dated: March 16, 2015

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Attorneys for Janssen Biotech, Inc. and New York University

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that on March 16, 2015 counsel for Plaintiffs conferred with counsel for Defendants and, in good faith, attempted to resolve or narrow the issues presented in this motion. Defendants oppose the relief sought herein.

/s/ Heather B. Repicky

Heather B. Repicky

CERTIFICATE OF SERVICE

I certify that on March 16, 2015, this document, filed through the ECF system, will be sent electronically to the parties or their counsel who are registered participants as identified on the Notice of Electronic Filing and if not so registered, that copies will be electronically mailed to such parties or their counsel.

/s/ Heather B. Repicky

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